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and Huamei Consulting Co., Inc.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

HARMONI INTERNATIONAL SPICE,
INC., a California corporation, and
ZHENGZHOU HARMONI SPICE CO.,
LTD., a corporation,

Plaintiff,

v.

WENZUAN BAI, an individual, JICHENG
YE, an individual, RUOPENG WANG, an
individual, ROBERT T. HUME, an
individual, JOEY C. MONTOYA, an
individual, STANLEY CRAWFORD, an
individual, AVRUM KATZ, an individual,
HUAMEI CONSULTING CO., INC., a
corporation, KWO LEE, INC., a California
corporation, SHUZHANG LI, an individual,
C. AGRICULTURE GROUP CORP.,
corporation, HEIBEI GOLDEN BIRD
TRADING CO., LTD., a corporation,
QINGDAO TIANTAIXING FOODS, CO.,
LTD., a corporation, JINXIANG HEJIA
CO., LTD., a corporation, QINGDAO
LIANGHE INTERNATIONAL TRADING
CO., LTD., a corporation, CHEN
HONGXIA, an individual, JIN XIA WEN,
an individual, MINGJU XU, an individual,
CAI DU, an individual, QINGHUI ZHANG,
an individual, LUCY WANG, an individual,

Defendants.

CASE NO: 2:16-cv-00614

Honorable Beverly Reid O'Connell

**DECLARATION OF ROBERT T.
HUME IN SUPPORT OF MOTION
TO STRIKE FIRST AMENDED
COMPLAINT**

DECLARATION OF ROBERT T. HUME

DECLARATION OF ROBERT T. HUME

I, Robert T. Hume, hereby declare and state as follows:

1. The facts attested below are known to me of my own personal knowledge and if called upon to testify regarding them, I could and would competently do so.


2. I am a named party in the within action, filed in the United States District Court, Central District of California, although I have no connection to or contact with the State of California.

3. Plaintiffs' First Amended Complaint alleges that my law firm filed pleadings and letter briefs with the Department of Commerce which allegedly contain false statements. These allegedly false pleadings and letter briefs (14 in total) are listed in paragraph 270 of Plaintiffs' First Amended Complaint.

4. Both I and my office staff, under my supervision, searched for the documents listed in paragraph 270 of Plaintiffs' First Amended Complaint, and were not able to identify or find any of the seven (7) DOC filings corresponding with the dates May 10, 2014; May 17, 2014; May 20, 2014; May 23, 2014; February 2, 2015; May 5, 2015; May 20, 2015. In addition to our physical files, we searched the DOC's electronic filing system and PACER. We cannot identify any filings corresponding with the dates listed above, which were taken from Plaintiffs' First Amended Complaint. Moreover, it does not appear that Plaintiffs have attached these seven (7) documents to any of their other filings.

I declare, under penalty of perjury under the laws of the State of California and the United States, that the foregoing is true and correct.

Executed this 25th day of March, 2016 at Taos, New Mexico.


Robert T. Hume

DECLARATION OF ROBERT T. HUME